

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Virginia

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Criminal No. 1:18 CR 83

The Honorable T.S. Ellis, III

**STIPULATION REGARDING PURCHASE OF LANDSCAPING SERVICES**

The parties stipulate to the following facts:

1. Scott L. Wilson Landscaping & Tree Specialists, Inc., operates in the Hamptons, New York area.
2. Scott Wilson is the owner of Scott L. Wilson Landscaping & Tree Specialists, Inc. and performs landscaping design and maintenance. He performed landscaping services for Paul J. Manafort, Jr.'s residence located at 174 Jobs Lane, Bridgehampton, New York. Scott L. Wilson Landscaping & Tree Specialists, Inc. received a total of \$503,500 from Global Highway Limited, Leviathan Advisors Limited, and Yiakora Ventures Limited between 2010 and 2011.
3. On May 11, 2010, \$44,000 was transferred from Global Highway Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.

4. On June 21, 2010, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted to Mr. Manafort invoice number 2852 in the amount of \$50,842 for landscaping services.
5. On June 28, 2010, \$50,000 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
6. On July 16, 2010, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 2861 in the amount of \$19,069 for landscaping services.
7. On July 23, 2010, \$19,000 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
8. On August 17, 2010, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 2883 in the amount of \$26,418 for landscaping services.
9. On September 2, 2010, \$21,000 was transferred from Yiakora Ventures Limited's bank account at Bank of Cyprus in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
10. On September 23, 2010, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 2898 in the amount of \$7,740 for landscaping services.

11. On October 6, 2010, \$57,700 was transferred from Global Highway Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
12. On October 27, 2010, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 2906 in the amount of \$20,568 for landscaping services.
13. On October 18, 2010, \$26,000 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
14. On November 30, 2010, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 2922 in the amount of \$8,532 for landscaping services.
15. On December 16, 2010, \$20,000 was transferred from Global Highway Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
16. On March 8, 2011, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 2962 in the amount of \$44,857 for landscaping services.
17. On March 22, 2011, \$50,000 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.

18. On May 3, 2011, \$40,000 was transferred from Global Highway Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
19. On June 1, 2011, \$44,000 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
20. On July 27, 2011, \$27,000 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
21. On August 16, 2011, \$13,450 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
22. On August 24, 2011, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 2997 in the amount of \$19,634 for landscaping services.
23. On September 19, 2011, \$12,000 was transferred from Leviathan Advisors Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.
24. On September 30, 2011, Scott L. Wilson Landscape & Tree Specialists, Inc. submitted invoice number 3019 in the amount of \$20,555 for landscaping services.



25. On October 24, 2011, \$42,000 was transferred from Global Highway Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.

26. On November 2, 2011, \$37,350 was transferred from Global Highway Limited's bank account at Marfin Laiki Bank in Nicosia, Cyprus to Scott L. Wilson Landscape & Tree Specialists, Inc.


27. The records attached to this stipulation as Exhibits A through I are records of Scott L. Wilson Landscaping & Tree Specialists, Inc. and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

We ask for this:


Paul J. Manafort, Jr.,  
Defendant

ROBERT S. MUELLER, III  
Special Counsel

By:

  
Kevin Downing, Esq.  
Tom Zehnle, Esq.  
Jay Nanavati, Esq.  
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By:

  
Andrew Weissmann  
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